

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

**FRANKLIN TREJO-CHAVARRIA,
a/k/a "Impulsivo,"**

**WILSON JOSE VENTURA-MEJIA,
a/k/a "Discreto," a/k/a "Disco,"**

**ANGEL MIGUEL AGUILAR-OCHOA,
a/k/a "Darki,"**

**WALTER ANTONIO CHICAS-GARCIA,
a/k/a "Walter," a/k/a "Mejia,"**

**MARLON MIRANDA-MORAN,
a/k/a "Chinki," and**

CARLOS ELIAS HENRIQUEZ-TORRES,
a/k/a "Kalin"

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CRIMINAL NO. 4:20-CR-00585

**(Murder in Aid of Racketeering,
18 U.S.C. § 1959(a)(1); Conspiracy
to Commit Murder in Aid
of Racketeering, 18 U.S.C.
§ 1959(a)(5); and Aiding and
Abetting, 18 U.S.C. § 2)**

GOVERNMENT'S MOTION TO DISMISS

COMES NOW, the United States Attorney for the Southern District of Texas, Jennifer B. Lowery, through Assistant United States Attorney John M. Lewis and Britni Cooper, Assistant United States Attorneys, David L. Jaffe, Chief of the Organized Crime and Gang Section of the U.S. Department of Justice, Gerald Collins, Julie Finocchiaro, and Matthew Hoff, Trial Attorneys, and moves the Court to dismiss Counts One and Two of the Indictment in this case against defendants **FRANKLIN TREJO-CHAVARRIA, WILSON JOSE VENTURA-MEJIA, ANGEL MIGUEL AGUILAR-OCHOA, WALTER ANTONIO CHICAS-GARCIA, MARLON MIRANDA-MORAN, and CARLOS ELIAS HENRIQUEZ-TORRES** for the following reasons:

On August 24, 2022, a federal grand jury returned an indictment against defendants **FRANKLIN TREJO-CHAVARRIA, WILSON JOSE VENTURA-MEJIA, ANGEL MIGUEL AGUILAR-OCHOA, WALTER ANTONIO CHICAS-GARCIA, MARLON MIRANDA-MORAN, and CARLOS ELIAS HENRIQUEZ-TORRES** (amongst other defendants) in Criminal Number 3:22-CR-0018. The charges in that indictment consolidate the counts in this case with additional counts.

On July 8, 2022, defendant **JIMMY VILLALOBOS-GOMEZ** pled guilty to a Superseding Information in Criminal Number 4:20-CR-585 that included the acts alleged in Counts One and Two of the Indictment in this case. As such, this Motion and Proposed Order to Dismiss does NOT apply to defendant **JIMMY VILLALOBOS-GOMEZ**.

WHEREFORE, the United States respectfully requests the Court to grant this Motion and dismiss Counts One and Two of the Indictment in this case against defendants **FRANKLIN TREJO-CHAVARRIA, WILSON JOSE VENTURA-MEJIA, ANGEL MIGUEL AGUILAR-OCHOA, WALTER ANTONIO CHICAS-GARCIA, MARLON MIRANDA-MORAN, and CARLOS ELIAS HENRIQUEZ-TORRES**.

Respectfully submitted,

Jennifer B. Lowery
UNITED STATES ATTORNEY

/s/John M. Lewis
John M. Lewis
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2022, a copy of the United States' Motion and Proposed Order to Dismiss was delivered to Anthony Troiani, Joel Bennett, Julie Soderlund, Nicholas Trenticosta and Octavio Bujosa, Counsel for defendants **WILSON JOSE VENTURA-MEJIA, ANGEL MIGUEL AGUILAR-OCHOA, WALTER ANTONIO CHICAS-GARCIA, MARLON MIRANDA-MORAN, and CARLOS ELIAS HENRIQUEZ-TORRES**, respectively, via email.

Defendant **FRANKLIN TREJO-CHAVARRIA** is still located in El Salvador and has not yet been extradited to the United States. He is not currently represented by counsel in the United States.

/s/John M. Lewis
John M. Lewis
Assistant United States Attorney

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ORDER

Upon the Motion of the United States and good cause shown, the Court finds that the interest of justice is served by granting this motion.

Therefore, it is ORDERED that the Government's Motion to Dismiss Counts One and Two of the Indictment in this case against defendants **FRANKLIN TREJO-CHAVARRIA, WILSON JOSE VENTURA-MEJIA, ANGEL MIGUEL AGUILAR-OCHOA, WALTER ANTONIO CHICAS-GARCIA, MARLON MIRANDA-MORAN, and CARLOS ELIAS HENRIQUEZ-TORRES** is granted.

Signed on this _____ day of _____ 2022.

THE HONORABLE KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF TEXAS